

C A D W A L A D E R

Cadwalader, Wickersham & Taft LLP
200 Liberty Street, New York, NY 10281
Tel +1 212 504 6000 Fax +1 212 504 6666
www.cadwalader.com

September 20, 2019

VIA ECF

Hon. Jesse M. Furman
Thurgood Marshal United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Alix v. McKinsey & Co., Inc., et al.*, No. 18-CV-04141(JMF)

Dear Judge Furman:


We represent Plaintiff Jay Alix (“**Plaintiff**” or “**Alix**”) in the above-referenced matter. We have reviewed Defendants’ submission of yesterday evening (ECF 119). Despite this Court’s order vacating Plaintiff’s Rule 41(a) notice (ECF 113), Defendants seek to press the issue of whether the notice is effective, apparently in a misguided effort to gain some perceived tactical advantage on appeal. We request the opportunity to be heard on the issue of the effectiveness of the Rule 41(a) notice and the related matters raised in Defendants’ submission, as well as the request for jurisdictional discovery. We therefore request leave to respond to Defendants’ brief by **Friday, October 4**.

Respectfully submitted,


Sean F. O'Shea

Cc: All counsel of record (by ECF)

No later than **October 3, 2019**, Plaintiff shall file any opposition to Defendants’ argument that “Alix’s Notice of Voluntary Dismissal Immediately and Irrevocably Dismissed the State-Law Claims.” ECF No. 119. No later than **October 10, 2019**, Defendants shall file any reply. SO ORDERED.


September 20, 2019